

**PELTON GRAHAM LLC**

ADVOCATES FOR JUSTICE

October 7, 2022

Brent E. Pelton, Esq.
Pelton@PeltonGraham.com**VIA CM/ECF**Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square, Room 619
New York, New York 10007**Re: *Ballast, et al. v. Workforce7 Inc., et al.***
Civil Action No.: 20-CV-03812 (ER)

Plaintiffs' request for an extension is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: October 11, 2022

New York, New York

Dear Judge Ramos:

This office represents the plaintiffs in the above-referenced action. We write, on the consent of all Defendants, to request an extension of Plaintiffs' deadline to file their proposed amended complaint or a motion to amend, which is currently set for October 7, 2022. (Dkt. No. 259).

In the parties' September 9, 2022 letter request for an extension of pending discovery deadlines, Plaintiffs informed the Court that they desire to amend their complaint to add certain additional named plaintiffs to replace former named plaintiff Marquis Richardson, whose claims were dismissed without prejudice on May 4, 2022. (Dkt. Nos. 246, 258). While Plaintiffs have made substantial progress, they are still working on finalizing their draft and anticipate exchanging it with Defendants for their review early next week. Thus, to allow Defendants sufficient time to review Plaintiffs' draft, Plaintiffs request until October 25, 2022, to file their proposed amended complaint or a motion to amend.

This is Plaintiffs' first request for an extension of the deadline to file their proposed amended complaint, and it is made on the consent of all parties.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Brent E. Pelton

Brent E. Pelton, Esq. of
PELTON GRAHAM LLC

Enclosure

cc: All Counsel (via CM/ECF)